

REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Newly-presented Claims 19 through 31 are pending, with Claims 19, 25, and 31 being independent. Claims 9 through 16 and 18 have been cancelled without prejudice.

The Official Action required that Figs. 9-14 be labeled as --PRIOR ART--. In response, transmitted herewith are seven replacement sheets of formal drawings (comprising Figs. 9, 10A-10C, 11, 12A-12D, 13E-13G, 14H-14K, and 15M-15Q) having been so labeled.

Claims 9 through 16 and 18 were rejected under 35 U.S.C. § 102(b) over WO 02/37847 A1 ("WO '847"). All rejections are respectfully traversed.

Claims 19, 25, and 31 variously recite, *inter alia*, in combination, (a) intrafield interpolation pixel motion information generating unit/step/means for generating first motion information based on the motion information on a reference pixel adjacent to an interpolation pixel in a field of interest, (b) interfield interpolation pixel motion information generating unit/step/means for generating second motion information based on the motion information on a reference pixel in a field previous to the field of interest and the motion information on a reference pixel in a next field following the field of interest, the reference pixels in the previous field and next field being at the same position as the interpolation pixel in the field of interest, and (c) interpolation pixel motion determining unit/step/means for determining whether motion information on the interpolation pixel is a moving image or a still image based on the first motion information generated by the intrafield interpolation pixel motion information generating unit/step/means and the second motion information generated by the interfield interpolation pixel motion information generating unit/step/means.

However, Applicants respectfully submit that WO '847 fails to disclose or suggest at least the above-discussed claimed features as recited, *inter alia*, in Claims 19, 25, and 31. Applicants respectfully submit that WO '847 discloses, e.g., that a difference judgment circuit 5 calculates a difference between a pixel value P of a corresponding pixel in the (n-1)th field and a

pixel value S of a corresponding pixel in the (n+1)th field; an interpolation circuit 3 calculates an interpolation value M from pixels in the nth field; an intermediate value selection circuit 4 selects an intermediate value from among the pixel value P in the (n-1)th field, the interpolation value M in the nth field, and the pixel value S in the (n+1)th field, and a calculation method for generating the interpolation signal is changed. However, Applicants respectfully submit that neither the foregoing nor the remainder of WO '847 provides either a description or a suggestion of at least the above-discussed claimed features as recited, *inter alia*, in Claims 19, 25, and 31.

Applicants also respectfully submit that there has been no showing of any indication of motivation in the cited documents that would lead one having ordinary skill in the art to arrive at the above-discussed claimed features.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

Applicants submit that this application is in condition for allowance, and a Notice of Allowance is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

/Daniel S. Glueck/
Attorney for Applicants
Daniel S. Glueck
Registration No. 37,838

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3800
Facsimile: (212) 218-2200

DSC/mcm